

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

v. )

DZHOKHAR TSARNAEV )

FILED  
IN CLERKS OFFICE  
No. 13-CR-10200-GAO  
2015 JAN 2 PM 1 47  
U.S. DISTRICT COURT  
DISTRICT OF MASS.**SEALED MOTION FOR DISCLOSURE OF JURY RECORDS**

Defendant, Dzhokhar Tsarnaev, by and through counsel, and pursuant to the Fifth and Sixth Amendments to the United States Constitution, *Duren v. Missouri*, 439 U.S. 357 (1979) and the Jury Selection and Service Act, 28 U.S.C. §§1867 (a) and (f), respectfully moves this Court for an Order for jury records for the Master and Supplemental Wheels drawn for the trial of this case, and the pool that was drawn for this trial. The defendant requests the same records for the Wheels and Pool as was previously ordered in DE 393.

From a review of the data provided by this Court on December 29, 2014, it appears that some 538 individuals did not respond, a substantially higher percentage of non-responses than should have been expected based on the data from the 2011- 2013 pools.

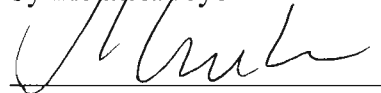
It appears that 819 individuals were disqualified or excused. The defendant requests the underlying data indicating the requests and reasons for disqualification or excusal.

It appears that some 206 summons were returned as undeliverable. The Court issues replacement summons and of those, 91 were qualified, 57 did not respond and

another 58 were undeliverable, disqualified or excused. The defendant requests the underlying data indicating the requests, and reasons for disqualification or excusal, and whether replacement summons were issues for the undeliverables.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys



Judy Clarke, Esq. (CA Bar # 76071)  
CLARKE & RICE, APC  
1010 Second Avenue, Suite 1800  
San Diego, CA 92101  
(619) 308-8484  
JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq.  
220 Sydney Lewis Hall  
Lexington, VA 24450  
(540) 460-8188  
BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)  
Timothy Watkins, Esq. (BBO # 567992)  
William Fick, Esq. (BBO # 650562)  
FEDERAL PUBLIC DEFENDER OFFICE  
51 Sleeper Street, 5th Floor  
(617) 223-8061  
MIRIAM\_CONRAD@FD.ORG  
TIMOTHY\_WATKINS@FD.ORG  
WILLIAM\_FICK@FD.ORG